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8 Attorneys for Plaintiff

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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

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14 UNITED STATES OF AMERICA,) No. CR 09-102 VRW
15 Plaintiff,)
16 v.) STIPULATION AND [PROPOSED] ORDER
17 MALU TAYLOR,) CHANGING STATUS CONFERENCE DATE
18 Defendant.) AND EXCLUDING TIME FROM
) DECEMBER 16, 2010 THROUGH MARCH 3,
) 2011
) Current date: Dec. 16, 2010, 2:00 p.m.
) Proposed date: Mar. 3, 2011, 2:00 p.m.

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21 Defendant Malu Taylor, represented by Laura Robinson, and the Government are
22 currently scheduled to appear before the Court for a status conference in the above-captioned
23 case on December 16, 2010.

24 Counsel for the defendant requests additional time to investigate the charges against the
25 defendant. Counsel for the defendant requests, based on that need, that the Court change the
26 status conference date from December 16, 2010 until March 3, 2011 and exclude time under the
27 speedy trial act from December 16, 2010 through March 3, 2011. The Government has no
28 objection. Additionally, the Court will be unavailable after December 16, 2010.

The parties represent that the requested continuance is the reasonable time necessary for effective preparation of counsel. 18 U.S.C. § 3161(h)(7)(B)(iv). The parties also agree that the ends of justice served by granting such a continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

SO STIPULATED:

MELINDA HAAG
United States Attorney

DATED: December 15, 2010

/s/

TAREK J. HELOU
Assistant United States Attorney

DATED: December 15 2010

/s/

LAURA ROBINSON
Attorney for MALU TAYLOR

Based upon the representation of counsel and for good cause shown, the Court finds that failing to exclude the time from December 16, 2010 through March 3, 2011 would unreasonably deny the defendant effective preparation of counsel. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from December 16, 2010 through March 3, 2011 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, IT IS HEREBY ORDERED that the time from December 16, 2010 through March 3, 2011 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). IT IS HEREBY FURTHER ORDERED THAT the status conference set for December 16, 2010 at 2:00 p.m. will be held on March 3, 2011 at 2:00 p.m.

DATED: December 16, 2010

